

REMARKS

Claims 11, 14, 15, 54, 57, 58, 89, 90, 96, and 97 are amended, claims 1-10, 17-53, 60-88 91-95, and 98-100 are canceled, and claims 101-104 are new. Claims 11-16, 54-59, 89, 90, 96, 97, and 101-104 are pending in this application, with claims 11, 14, 54, 57, 89, 90, 96, and 97 being in independent form.

In the Office Action¹, the Examiner took the following actions:

rejected claims 13 and 56 under 35 U.S.C. § 112, second paragraph; and

rejected claims 11-16, 54-59, 89, 90, 96, and 97 under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,285,777 to Kanevsky et al. ("Kanevsky").

REJECTION OF CLAIMS 13 and 56 UNDER § 112

Applicant respectfully traverses the rejection of claims 13 and 56 under 35 U.S.C. § 112, second paragraph. The Office Action alleges that the limitation "wherein the static address database is a United States Postal Service static monolithic address database" is vague and indefinite because "it is unclear to the Examiner what 'monolithic' means as used in the claimed invention." Office Action at 3. Applicant asserts that one having ordinary skill in the art would appreciate the meaning of this claim term in view of Fig. 11B of the pending application and the discussion at pages 23-24 of the Specification. For example purposes only, Applicant provides the attached "Introduction to Database Management: VII. Database System Architecture" document available at <http://www.cs.uwaterloo.ca/~gweddell/cs448/Arch.pdf> (last visited May 27,

¹ The Office Action may contain a number of statements reflecting characterizations of the related art and the claims. Regardless of whether any such statement is identified herein, Applicants decline to automatically subscribe to any statement or characterization in the Office Action.

2008), in which “monolithic” is used in connection with databases. Accordingly, Applicant requests the Examiner to reconsider and withdraw the rejection of claims 13 and 56 under 35 U.S.C. § 112.

REJECTION OF CLAIMS 11-16, 54-59, 89, 90, 96, and 97 UNDER § 103(a)

Applicant respectfully traverses the rejection of claims 11-16, 54-59, 89, 90, 96, and 97 under 35 U.S.C. § 103(a) as being unpatentable over Kanevsky. A *prima facie* case of obviousness has not been established.

The key to supporting any rejection under 35 U.S.C. § 103 is the clear articulation of the reason(s) why the claimed invention would have been obvious. See M.P.E.P. § 2142, 8th Ed., Rev. 6 (Sept. 2007). Such an analysis should be made explicit and cannot be premised upon mere conclusory statements. See id. “A conclusion of obviousness requires that the reference(s) relied upon be enabling in that it put the public in possession of the claimed invention.” M.P.E.P. § 2145. Moreover, “[i]n determining the differences between the prior art and the claims, the question under 35 U.S.C. § 103 is not whether the differences themselves would have been obvious, but whether the claimed invention as a whole would have been obvious.” M.P.E.P. § 2141.02(I), internal citations omitted (emphasis in original).

“[T]he framework for the objective analysis for determining obviousness under 35 U.S.C. 103 is stated in *Graham v. John Deere Co.*, 383 U.S. 1, 148 USPQ 459 (1966). . . . The factual inquiries . . . [include determining the scope and content of the prior art and] . . . [a]scertaining the differences between the claimed invention and the prior art.” M.P.E.P. § 2141(II). “Office personnel must explain why the difference(s) between the

prior art and the claimed invention would have been obvious to one of ordinary skill in the art.” M.P.E.P. § 2141(III).

As amended, independent claim 11 recites a method for method for determining a standardized physical address of a user comprising, among other steps, “**creating a static address database from a master address database**, the static address database containing the standardized physical address of the user, **wherein the standardized physical address conforms to a standard format.**” (emphasis added).

Kanevsky discloses “[a] communication system that transmits and receives combinations of paper mail and electronic mail.” Kanevsky at Abstract. In the Kanevsky system, “database means 108 contains all addresses of senders and recipients that were recorded at a given time. Database 108 also indicates what addresses of senders/recipients were simultaneously on one envelope/letter.” Kanevsky at column 5 lines 49 through 52. According to Kanevsky,

The ascii files 104, 106 are sent to a comparator means 110 where it is determined whether similar information (representing one or all of items of the ascii files 104, 106 are stored in the database of sender/receive communication means 108. If it determines that some sender or receiver addresses match in most of characters to a decoded addresses from the files 104, 106 this information is sent to a corrector means 112. Corrector means 112 corrects the address from the 104 or 106 files. For example, a correct written e-mail address 92 is smith@nescr.com and destination address 96 is Jones@westch.com If the e-mail addresses in 104 and 106 were decoded as smith@resctus.com and Jones@westu.com. If Smith sent messages to Jones in past, these addresses were recorded in the database 108 and related. This information can be used in corrector means 112 to correct the addresses in 104 and 106.

Kanevsky at column 5, line 55 through column 6, line 4.

Although Kanevsky teaches “database means,” Kanevsky fails to teach or suggest “**creating a static address database from a master address database**, the static address database containing the standardized physical address of the user.” In addition, Kanevsky’s “corrector means . . . to correct the addresses” teaches address error correction, at best, and does not teach or suggest that “**the standardized physical address conforms to a standard format**,” as recited in claim 11. Moreover, Kanevsky does not teach or suggest the use of an “electronic account” as is recited in claim 11.

Accordingly, Kanevsky does not teach or suggest all of the elements of independent claim 11. Moreover, nothing in Kanevsky would motivate or suggest to one of ordinary skill in the art to modify the teachings of Kanevsky to achieve the claimed combination. In view of the above, the Office Action has neither properly determined the scope and content of the prior art nor properly ascertained the differences between the prior art and the claimed invention. Consequently, the Office Action has failed to clearly articulate a reason why the claim would have been obvious to one of ordinary skill in view of the prior art. Therefore, a *prima facie* case of obviousness has not been established for at least the reasons discussed above and the Examiner should withdraw the rejection of independent claim 11 under 35 U.S.C. § 103(a).

Independent claims 54, 89, and 96, although of a different scope from claim 11 and from each other, include recitations that are similar to those discussed above in connection with claim 11. Accordingly, a *prima facie* case of obviousness has not been established for claims 54, 89, and 96 for at least the same reasons discussed above.

Claims 12-13 and 55-56 depend from one of allowable independent claims 11 and 54 , and are allowable at least due to their dependence. Therefore, for at least these reasons, the Examiner should also withdraw the rejection of claims 12-13, 54-56, 89, and 96 under U.S.C. § 103(a).

As amended, independent claim 14 recites a method for determining a standardized physical address of a user comprising, among other steps, “accessing an address database containing the standardized physical address of the user, wherein the standardized physical address conforms to a standard format.” As discussed above in connection with claim 11, Kanevsky does not teach or suggest that “**the standardized physical address conforms to a standard format,**” as recited in claim 14. Moreover, Kanevsky does not teach or suggest the use of an “electronic account” as is recited in claim 14.

Accordingly, Kanevsky does not teach or suggest all of the elements of independent claim 14. Moreover, nothing in Kanevsky would motivate or suggest to one of ordinary skill in the art to modify the teachings of Kanevsky to achieve the claimed combination. In view of the above, the Office Action has neither properly determined the scope and content of the prior art nor properly ascertained the differences between the prior art and the claimed invention. Consequently, the Office Action has failed to clearly articulate a reason why the claim would have been obvious to one of ordinary skill in view of the prior art. Therefore, a *prima facie* case of obviousness has not been established for at least the reasons discussed above and the Examiner should withdraw the rejection of independent claim 14 under 35 U.S.C. § 103(a).

Independent claims 57, 90, and 97, although of a different scope from claim 14 and from each other, include recitations that are similar to those discussed above in connection with claim 14. Accordingly, a *prima facie* case of obviousness has not been established for claims 57, 90, and 97 for at least the same reasons discussed above. Claims 15-16 and 58-59 depend from one of allowable independent claims 14 and 57, and are allowable at least due to their dependence. Therefore, for at least these reasons, the Examiner should also withdraw the rejection of claims 15-16, 57-59, 90, and 97 under U.S.C. § 103(a).

NEW CLAIMS 101-104

Applicant respectfully requests consideration and allowance of new claims 101-104. Support for new claims 101-104 can be found at, for example, page 21, line 13 through page 22, line 2.

CONCLUSION

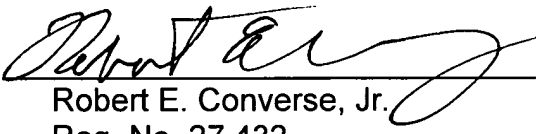
In view of the foregoing amendments and remarks, Applicant respectfully requests reconsideration and reexamination of this application and the timely allowance of the pending claims.

Please grant any extensions of time required to enter this response and charge any additional required fees to our Deposit Account No. 06-0916.

Respectfully submitted,

FINNEGAN, HENDERSON, FARABOW,
GARRETT & DUNNER, L.L.P.

Dated: May 27, 2008

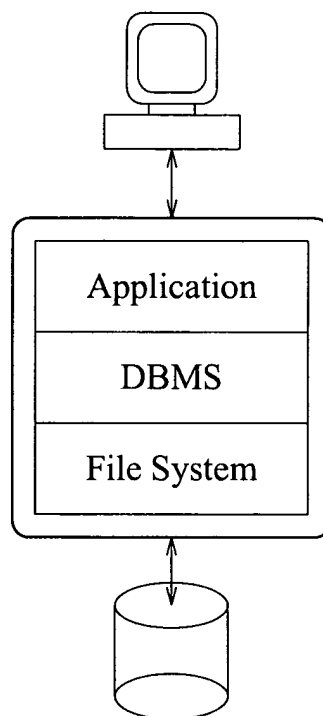
By: 
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VII. Database System Architecture

Lecture Topics

- Monolithic systems
- Client/Server systems
- Parallel database servers
- Multidatabase systems

Monolithic System



Each component presents a well-defined interface to the component above.

Component Functions

- **Applications**

- User interaction: input of queries and data, display of results
- Application-specific tasks

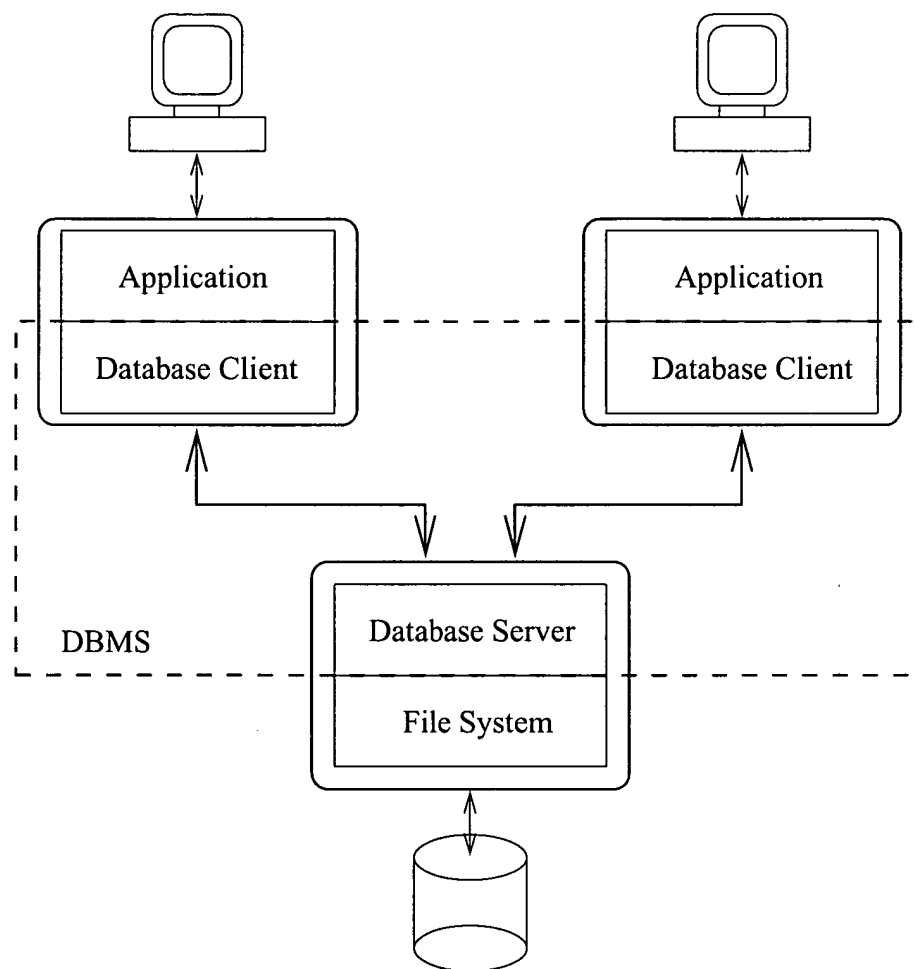
- **The DBMS**

- Query optimization: selection of one of many possible procedures for executing a query
- Query processing: execution of the selected query
- Buffer management: allocation and control of memory
- Transaction management: concurrency control, rollback, and failure recovery
- Security and integrity management: access control and consistency checking

- **The File System**

- Storage and retrieval of unstructured data

Client/Server System

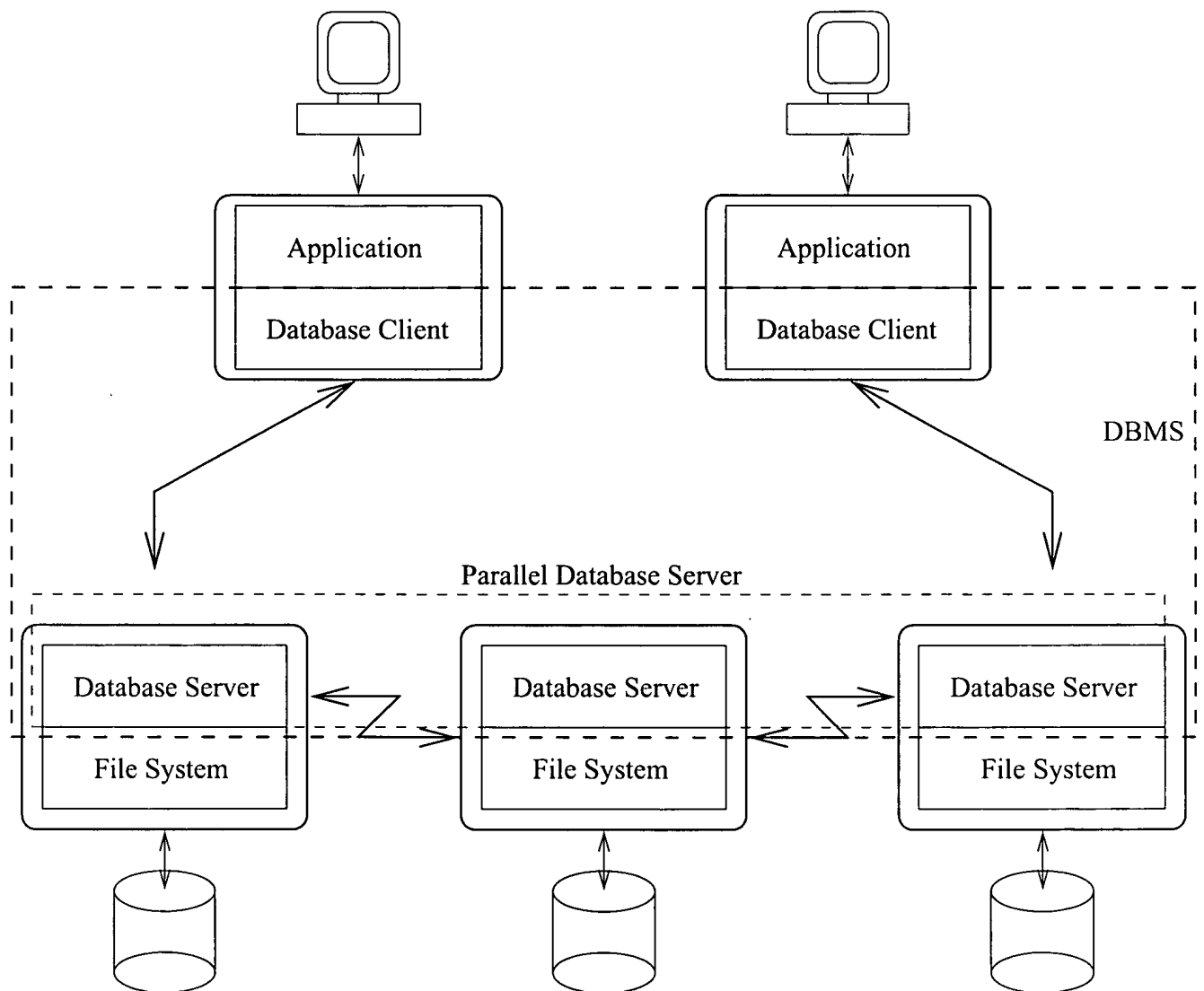


Client/Server System (cont.)

- **DBMS Client:** packs application requests into messages, sends messages to server, waits for and unpacks the response
- **DBMS Server:** all database system functions, including query processing and optimization, transaction management, security and integrity management, buffer management

Client/server separation allows user interaction and database management to be performed by different processors

Parallel/Distributed Database Server



Parallel/Distributed Database Server (cont.)

- Data is distributed across the **sites**
- Relations may be fragmented
- Relations (or fragments of relations) maybe replicated at several sites

Component servers are intended to operate as a team, not independently.

- A single, common schema
- Distribution of data is transparent
- Distribution of computation is transparent
- Replication is transparent
- Fragmentation is transparent

Parallel vs. Distributed

- **Parallel Database Server**

- servers in physical proximity to each other
- fast, high-bandwidth communication between servers, usually via a LAN or shared memory
- queries often processed cooperatively by all servers

- **Distributed Database Server**

- servers may be widely separated
- server-to-server communication may be slower, possibly even via a WAN
- queries often processed by a single server

Parallel/Distributed: Why?

- Reliability and Availability: if one server fails, another can take its place
- Faster Query Processing: several servers can cooperate to process a query

Horizontal Fragmentation

Complete relation:

Vno	Vname	City	Vbal
1	Sears	Toronto	200.00
2	Kmart	Ottawa	671.05
3	Eatons	Toronto	301.00
4	The Bay	Ottawa	162.99

Horizontally fragmented relation (two sites):

Site 1 (Ottawa site)

Vno	Vname	City	Vbal
2	Kmart	Ottawa	671.05
4	The Bay	Ottawa	162.99

Site 2 (Toronto site)

Vno	Vname	City	Vbal
1	Sears	Toronto	200.00
3	Eatons	Toronto	301.00

Vertical Fragmentation

Complete relation:

Vno	Vname	City	Vbal
1	Sears	Toronto	200.00
2	Kmart	Ottawa	671.05
3	Eatons	Toronto	301.00
4	The Bay	Ottawa	162.99

Vertically fragmented relation (two sites):

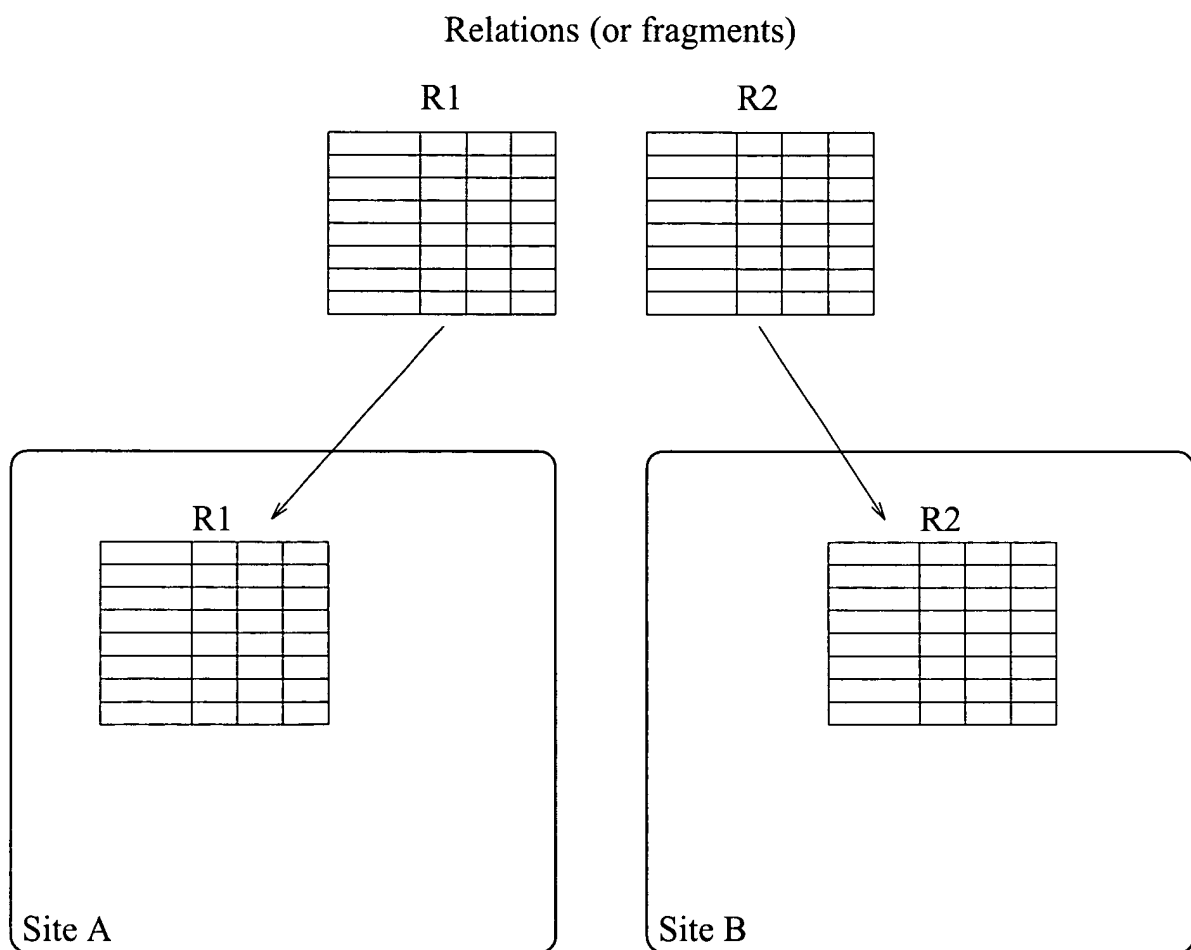
Site 1

Vno	Vname	City
1	Sears	Toronto
2	Kmart	Ottawa
3	Eatons	Toronto
4	The Bay	Ottawa

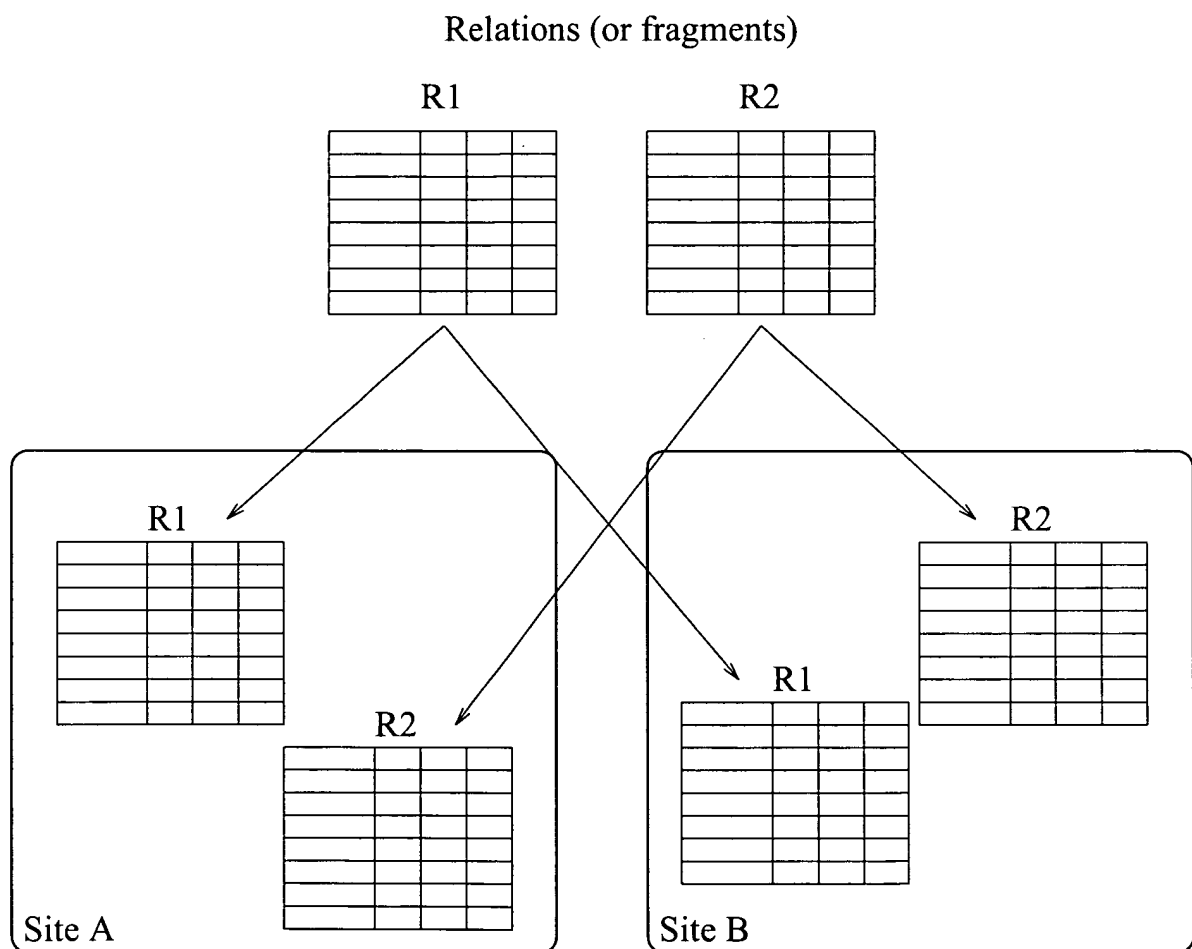
Site 2

Vno	Vbal
1	200.00
2	671.05
3	301.00
4	162.99

Data Distribution

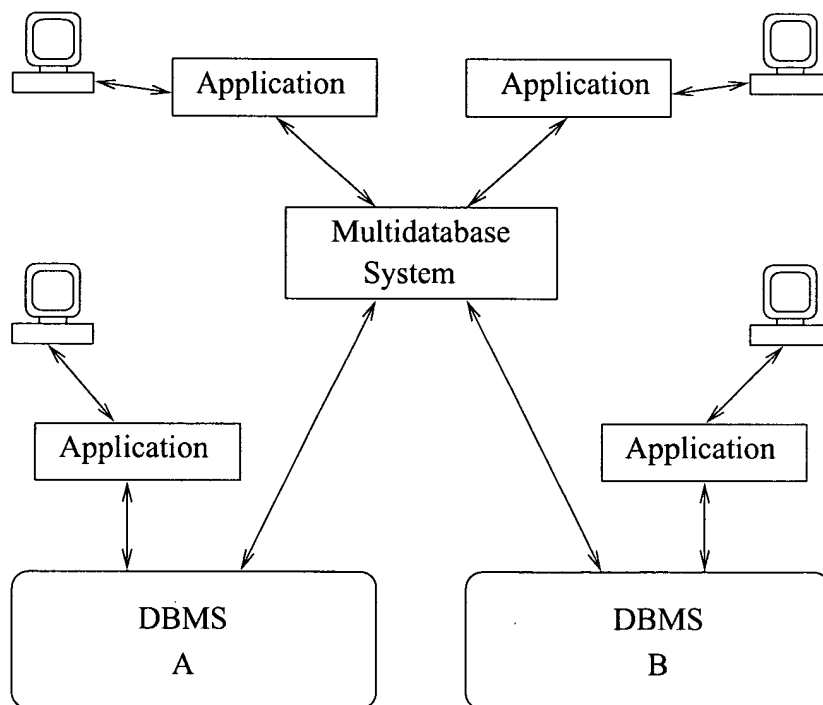


Data Replication



Multidatabase System

- Application perceives a single database system
- Database systems are autonomous



Multidatabase System w/ Gateway

